

RENTOKIL, INC.  
ADMINISTRATIVE RECORD FILE \*  
INDEX OF DOCUMENTS

I. SITE IDENTIFICATION

1. Report: Preliminary Assessment of Virginia Wood Preserving, prepared by Bureau of Solid Waste Management, Virginia State Health Department, 3/84.  
P. 100001-100035.
2. Report: Site Inspection of Rentokil, Inc., prepared by NUS Corporation Superfund Division, 3/24/86.  
P. 100036-100271.
3. Report: Preliminary Investigation of Hydrogeological Conditions, and Soil and Ground-Water Contamination, at the Virginia Wood Preserving Contamination Site, prepared by Bennett & Williams, Inc., 9/9/86. P. 100272-100496.

\* Administrative Record File available 11/1/89,  
updated 1/8/93, 1/15/93, 6/29/93, 5/3/96, 2/19/97,  
and 1/17/00.

## II. REMEDIAL ENFORCEMENT PLANNING

1. Administrative Order by Consent In The Matter Of:  
Virginia Wood Preserving Site, Rentokil  
Incorporated, 10/15/87. P. 200001-200033.
2. Letter to Mr. H. Linwood Farmer, Jr., Virginia  
Properties, Inc., from Mr. Thomas C. Voltaggio, U.S.  
EPA, re: Dispute resolution of draft Feasibility  
Study Report, Administrative Order by Consent,  
9/22/92. P. 200034-200039.

III. REMEDIAL RESPONSE PLANNING

1. Report: Work Plan and Quality Assurance Project Plan, prepared by Dames and Moore, 4/3/89. P. 300001-301045. Appendices A through G and a letter regarding modifications to Rentokil Quality Assurance Project Plan (QAPjP) are attached.
2. Report: Remedial Investigation Report, Volume I - Text, Virginia Wood Preserving Site, Richmond, Virginia, prepared by Dames & Moore, 5/31/90. P. 301045a-301310.
3. Report: Remedial Investigation Report, Volume II - Appendices A-B, Virginia Wood Preserving Site, Richmond, Virginia, prepared by Dames & Moore, 5/31/90. P. 301311-301541.
4. Report: Remedial Investigation Report, Volume III - Appendices C-L, Virginia Wood Preserving Site, Richmond, Virginia, prepared by Dames & Moore, 5/31/90. P. 301542-301841.
5. Report: Phase II Work Plan and Quality Assurance Project Plan, Volume I - Text, Virginia Wood Preserving Site, Richmond, Virginia, prepared by Dames & Moore, 12/21/90. P. 301842-301954.
6. Report: Phase II Work Plan and Quality Assurance Project Plan, Volume II - Appendices A through E, Virginia Wood Preserving Site, Richmond, Virginia, prepared by Dames & Moore, 12/21/90. P. 301955-302337.
7. Report: Phase II Remedial Investigation Report, Volume I - Text, Virginia Wood Preserving Site, Richmond, Virginia, prepared by Dames & Moore, 2/92. P. 302338-302574.
8. Report: Phase II Remedial Investigation Report, Volume II - Appendices, Virginia Wood Preserving Site, Richmond, Virginia, prepared by Dames & Moore, 2/92. P. 302575-302839.
9. Letter to Mr. Andrew Palestini, U.S. EPA, from Mr. Paul Spaulding, Virginia Department Waste Management

(VDWM), re: Preliminary identification of Virginia ARARs, 2/10/92. P. 302840-302844.

10. Letter to Mr. H. Linwood Farmer, Jr., Virginia Properties, Inc., from Mr. Andrew Palestini, U.S. EPA, re: Comments on the Preliminary Working Draft of the Feasibility Study, 4/23/92. P. 302845-302849.
11. Letter to Mr. H. Linwood Farmer, Jr., Virginia Properties, Inc., from Mr. Andrew Palestini, U.S. EPA, re: Comments on the draft Feasibility Study, 7/8/92. P. 302850-302853.
12. Letter to Mr. H. Linwood Farmer, Jr., Virginia Properties, Inc., from Ms. Kimberly A. Hummel, U.S. EPA, re: Clean-up values for remediating the site soils, 7/17/92. P. 302854-302856.
13. Letter to Ms. Kimberly A. Hummel, U.S. EPA, from Mr. Donald D. Anderson, McGuire, Woods, Battle & Boothe, re: Virginia Properties, Inc.'s notice of dispute of EPA's disapproval of the draft Feasibility Study Report, 7/30/92. P. 302857-302870. An article entitled "Cancer risk management," Table 1, Preregulatory risk levels for chemical carcinogen exposures, and an article entitled "Determining an acceptable level of risk" are attached.
14. Letter to Mr. H. Linwood Farmer, Jr., Virginia Properties, Inc., from Mr. Andrew Palestini, U.S. EPA, re: Modification of two of the site soil clean-up values and a list of the EPA positions on issues discussed with Dames & Moore on July 28 and July 30, 1992, 7/31/92. P. 302871-302873.
15. Report: Feasibility Study, Virginia Wood Preserving Site, Richmond, Virginia, prepared by Dames & Moore, 8/92. P. 302874-303222.
16. Letter to Mr. William Woodfin, VDWM, from Mr. Thomas C. Voltaggio, U.S. EPA, re: Request for approval from VDWM to allow backfilling of soil from the site after it is treated to meet the approved site-specific clean-up levels, 9/3/92. P. 303223-303224.

17. Letter to Mr. Thomas C. Voltaggio, U.S. EPA, from Mr. William L. Woodfin, Jr., VDWM, re: Concurrence with the proposed remedial action and request that full documentation supporting this action be in the record, 10/8/92. P. 303225-303226. The administrative review regarding backfilling of soil from the site is attached.
18. Letter to Mr. Thomas C. Voltaggio, U.S. EPA, from Mr. Jonathan P. Deason, U.S. Department of the Interior, re: Preliminary Natural Resources Survey, 12/7/92. P. 303227-303237. A Technical Analysis of the Rentokil, Inc. - Virginia Wood Preserving Site, Figure 1, Site Location Map, and Figure 2, Site Location Map, are attached.
19. Proposed Plan, Rentokil (Virginia Wood Preserving) Site, Richmond, Virginia, 1/93. P. 303238-303264.
20. Cost Breakdown for Alternative 6, (undated). P. 303265-303265.
21. Letter to Mr. Andy Palestini, U.S. EPA and Ms. Jennifer Ebert, VDWM, from Mr. Donald D. Anderson, McGuire, Woods, Battle & Boothe, re: Virginia Properties, Inc.'s request for extension of public comment period on the Proposed Remedial Action Plan, 1/25/93. P. 303266-303268. An envelope is attached.
22. Letter to Mr. Andrew Palestini, U.S. EPA, from Mr. George T. Drumwright, Jr., County of Henrico, re: Acknowledgement of extension request of public comment period, 2/5/93. P. 303269-303269.
23. Letter to Ms. Kimberly A. Hummel, U.S. EPA from, Mr. Douglas R. Manning, Rentokil Contract Services, Inc., re: Discussion of a modified approach that combines Alternatives 2 & 3 to treating contaminants, 2/23/93. P. 303270-303271.

24. Report: Proposed Alternative 7 Total Containment/Contaminant Toxicity Reduction for Virginia Wood Preserving Site, prepared by Dames & Moore, 2/23/93. P. 303272-303325. A transmittal sheet is attached.
25. Letter to Mr. Andrew Palestini, U.S. EPA, from Mr. George T. Drumwright, Jr., County of Henrico, re: Recommendations for considering Alternative 7 as the Proposed Plan remedy, 3/9/93. P. 303326-303330.
26. Letter to Mr. Andrew Palestini, U.S. EPA, from Ms. Susan H. Buffington, Richmond Land Corporation, re: Comments to the Proposed Remedial Action Plan, including the Feasibility Study, 3/10/93. P. 303331-303343. The comments are attached.
27. Letter to Mr. Andy Palestini, U.S. EPA and Ms. Jennifer Ebert, VDWM, from Mr. H. Linwood Farmer, Jr., Virginia Properties, Inc., re: Comments on the Proposed Plan, 3/10/93. P. 303344-303886. The following are attached:
  - a) Comments of Virginia Properties, Inc. on the Environmental Protection Agency's Proposed Plan for the Virginia Wood Preserving Site;
  - b) Exhibit A, Proposed Alternative 7, Total Containment/Contaminant Toxicity Reduction for Virginia Wood Preserving Site;
  - c) Exhibit B, Report of Sampling North Run Creek, Virginia Wood Preserving Site, Henrico County, Virginia;
  - d) Exhibit C, Draft Feasibility Study, Virginia Wood Preserving Site, Richmond, Virginia;
  - e) Exhibit D, Feasibility of Construction on a Cap: A Case Study;

- f) Exhibit E, Assessment of United States Environmental Protection Agency Records of Decision for Wood Preserving Sites;
  - g) Exhibit F, A Review of the Current Status of Low Temperature Thermal Desorption Technology;
  - h) Exhibit G, a letter regarding Virginia Properties' response to questions and information about the proposed remedial alternative, January 5, 1993.
- 28. Letter to Mr. George T. Drumwright, Jr., County of Henrico, from Mr. Andrew Palestini, U.S. EPA, re: Acknowledgement of receipt of comments to the Proposed Plan, 4/2/93. P. 303887-303887.
- 29. Letter to Mr. Andy Palestini, U.S. EPA, from Mr. H. Linwood Farmer, Jr., Virginia Properties, Inc., re: Comments on the draft Record of Decision (ROD), 5/24/93. P. 303888-303891.
- 30. Letter to Mr. H. Linwood Farmer, Jr., Virginia Properties, Inc., from Mr. Andrew Palestini, U.S. EPA, re: Acknowledgement of receipt of letter dated May 24, 1993 and notice of comments to be included in the Responsiveness Summary, 6/8/93. P. 303892-303892.
- 31. Letter to Mr. Abraham Ferdas, U.S. EPA, from K.C. Das, Department of Environmental Quality, re: Discussion of the draft ROD and concurrence with selected remedy, 6/18/93. P. 303893-303894.
- 32. Record of Decision, Rentokil/Virginia Wood Preserving, Richmond, Virginia, 6/22/93. P. 303895-303994.
- 33. Report: Remedial Design for the Virginia Wood Preserving Site, Value Engineering Report, prepared by Dames & Moore, Inc., 11/10/94. P. 303995-304084.
- 34. Proposed Plan for Amendment of Record of Decision, Rentokil, Inc., 5/96. P. 304085-304095.

Record of Decision Amendment

35. Record of Decision Amendment, Rentokil, Inc.,  
8/27/96. P. 304096-304121.

36. Preliminary Close Out Report, Rentokil, Inc.,  
9/2/99. P. 304122-304128.



V. COMMUNITY INVOLVEMENT/CONGRESSIONAL  
CORRESPONDENCE/IMAGERY

1. Community Relations Update, Rentokil, Inc. Site, Henrico County, Virginia, Winter 1990. P. 500001-500002.
2. Community Relations Plan, Rentokil, Inc., (Virginia Wood Preserving), Henrico County, Virginia, prepared by Virginia Department of Waste Management (VDWM), 4/91. P. 500003-500029.
3. Community Relations Update, Rentokil, Inc. (Virginia Wood Preserving) Superfund Site, 7/91. P. 500030-500031.
4. Community Relations Update, Rentokil, Inc. Superfund Site, 11/91. P. 500032-500033.
5. Community Relations Update, Rentokil, Inc. Superfund Site, 3/92. P. 500034-500035.
6. Community Relations Update and Citizen Advisory, Rentokil, Inc. Superfund Site, 6/92. P. 500036-500037.
7. Community Relations Update, Rentokil, Inc. Superfund Site, 9/92. P. 500038-500038.
8. Transcript of Proceeding, Proposed Plan Meeting, Rentokil Superfund Site, 1/20/93. P. 500039-500084.
9. Letter to Mr. Andrew Palestini, U.S. EPA, from Mr. Alan Pollock, re: Comments on the public meeting, 1/28/93. P. 500085-500086.

10. Letter to Mr. Andrew Palestini, U.S. EPA, from Ms. Carmen D. Yarbrough, re: Request for response to questions regarding the pollution of property owned by Carmen D. Yarbrough, 2/3/93. P. 500087-500093. The following are attached:
- a) a partial newspaper article entitled "EPA close to deciding on Rentokil plant cleanup plan;"
  - b) a partial newspaper article entitled "FYI;"
  - c) two newspaper photographs of a pond;
  - d) a newspaper article entitled "Couples sees Talley place as dream come true."
11. Letter to Mr. and Mrs. Walter R. Yarbrough, III, from Ms. Jennifer Ebert, VDWM, re: Preparation of responses to comments concerning health risks and liability to be included in the Responsiveness Summary, 3/17/93. P. 500094-500094.

SITE SPECIFIC GUIDANCE DOCUMENTS INCLUDED

1. Engineering Bulletin, Thermal Desorption Treatment, prepared by U.S. EPA, OERR, and ORD, 5/91.  
EPA/540/2-91/008
2. A Guide to Principal Threat and Low Level Threat Wastes, prepared by U.S. EPA and OSWER, 11/91.  
9380.3-06FS
3. Project Summary, On-Site Engineering Report for the Low-Temperature Thermal Desorption Pilot-Scale Test on Contaminated Soil, prepared by U.S. EPA, Risk Reduction Engineering Laboratory, Michael L. Smith, Arend Groen, Judy Hessling, and Edward Alperin, 9/92.  
EPA/600/SR-92/142
4. Contaminants and Remedial Options at Wood Preserving Sites, prepared by U.S. EPA and ORD, 10/92.  
EPA/600/R-92/182
5. Superfund Innovative Technology Evaluation (SITE), Demonstration Bulletin, X\*Trax<sup>TM</sup> Model 200 Thermal Desorption System, prepared by U.S. EPA, 2/93.  
EPA/540/MR-93/502

#### BIBLIOGRAPHY OF SITE SPECIFIC GUIDANCE DOCUMENTS

1. Guidance for Conducting Remedial Investigations and Feasibility Studies Under CERCLA, prepared by OSWER/OERR, 10/1/88.  
OSWER 9355.3-01
2. The Feasibility Study - Development and Screening of Remedial Action Alternatives [Quick Reference Fact Sheet], prepared by OSWER, 11/1/89.  
OSWER 9355.3-01FS3
3. The Feasibility Study: Detailed Analysis of Remedial Action Alternatives [Quick Reference Fact Sheet], prepared by OSWER, 3/1/90.  
OSWER 9355.3-01FS4
4. Guidelines for Ground-Water Classification Under the EPA Ground-Water Protection Strategy (Draft), prepared by Office of Ground-Water Protection, 12/1/86.
5. CERCLA Compliance with Other Laws Manual (Draft), prepared by OERR, 8/8/88.  
OSWER 9234.1-01
6. Quality Criteria for Water, 1986, prepared by Office of Water Regulations and Standards, 5/1/87.  
EPA/440/5-86-00